

**BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA
DOCKET NOS. 2020-264-E AND 2020-265-E**

IN RE:)	
)	
Duke Energy Carolinas, LLC's)	
Establishment of Solar Choice Metering)	
Tariffs Pursuant to S.C. Code Ann.)	Petition to Intervene of the
Section 58-40-20)	Solar Energy Industries Association
)	
Duke Energy Progress, LLC's)	
Establishment of Solar Choice Metering)	
Tariffs Pursuant to S.C. Code Ann.)	
Section 58-40-20)	

Pursuant to Rule 103-825 of the rules and regulations of the South Carolina Public Service Commission ("Commission"), the Solar Energy Industries Association ("SEIA") hereby respectfully petitions to intervene in the above-captioned dockets for the *Establishment of Solar Choice Net Metering Tariffs* for Duke Energy Carolinas, LLC and Duke Energy Progress, LLC. In support of this Petition, SEIA states as follows:

1. SEIA is the national trade association of the U.S. solar energy industry, which now employs more than 260,000 Americans. SEIA represents organizations that promote, manufacture, install and support the development of solar energy.

2. SEIA works with its 1,000 member companies to build jobs and diversity, champion the use of cost-competitive solar in America, remove market barriers and educate the public on the benefits of solar energy.

3. Since 1974, SEIA has been a driving force behind solar energy and building a strong solar industry to power America consistent with its mission to work towards a transformed energy supply and delivery system, such that solar electric and thermal technologies, in collaboration with other clean, reliable, affordable renewable resources and storage, fuel this country's economy.

4. SEIA's membership includes many national solar companies that own and operate projects in South Carolina who have local employees as well as companies that list a specific operating address in South Carolina.

5. SEIA's members, including its members in South Carolina, are engaged in manufacturing solar photovoltaic equipment, developing solar photovoltaic projects, providing solar energy equipment, services and expertise to retail, commercial and industrial customers.

6. SEIA member companies develop, construct, own, operate, finance, and otherwise service solar generating facilities across the state operating under the current net metering structure in South Carolina.

7. SEIA member companies are planning to develop, construct, own, operate, and otherwise service future solar projects in South Carolina, the success of which will rely on the outcome of these proceedings.

8. Consistent with its mission, SEIA engages in advocacy and education to foster solar development by expanding markets, removing market barriers, and educating the public on the benefits of solar energy. SEIA actively participates in state utility regulatory commission proceedings, testifies before state legislative bodies, and hosts seminars and events on solar policy issues around the country.

9. SEIA's principal place of business 1425 K St NW, Suite 1000, Washington, D.C. 20005.

10. SEIA is represented in these proceedings by its undersigned counsel who is duly licensed to practice law in the State of South Carolina and SEIA requests the undersigned counsel be added to the official service lists:

Jeffrey W. Kuykendall Attorney at Law
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11. SEIA consents to service via electronic mail and requests that all filings and communications regarding these dockets be directed to SEIA's counsel of record and that copies of the same be directed to the following persons:

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12. SEIA has been active in using its experience and perspective to help to shape energy policy in South Carolina. SEIA was directly involved in the legislative process that resulted in Act 62, "The Energy Freedom Act," which prompted these proceedings and SEIA is an active party in Docket No. 2019-182-E, the *Generic Docket to (1) Investigate and Determine the Costs and Benefits of the Current Net Energy Metering Program and (2) Establish a Methodology for Calculating the Value of the Energy Produced by Customer-Generators*. Contemporaneous with this filing, SEIA is filing a petition to intervene in Docket No. 2020-229-E for the *Establishment of Solar Choice Net Metering Tariffs* for Dominion Energy South Carolina.

13. SEIA has extensive experience and unique industry insights regarding the subject matters at issue in these proceedings and SEIA's participation will contribute to the development of a record upon which the Commission may make determinations consistent with the requirements of the Energy Freedom Act.

14. SEIA will substantially and specifically be affected by the result of these proceedings.

15. No other party will adequately represent SEIA's interests in these proceedings.

WHEREFORE, SEIA respectfully requests that the Commission grant this petition to intervene and allow SEIA to participate fully as a party in the above captioned proceedings so SEIA may protect its unique and substantial interests.

Respectfully Submitted,

/s/ Jeffrey W. Kuykendall

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Attorney for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing Petition to Intervene by hand delivery, first class mail deposited in the U.S. mail, postage pre-paid, or by email transmission with the party's consent.

This the 6th day of November, 2020.

/s/ Jeffrey W. Kuykendall

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